

GIBSON DUNN

Gibson, Dunn & Crutcher LLP

200 Park Avenue
New York, NY 10166-0193
Tel 212.351.4000
www.gibsondunn.com

Akiva Shapiro
Direct: +1 212.351.3830
Fax: +1 212.351.6340
AShapiro@gibsondunn.com

November 7, 2022

VIA ECF

Hon. Edgardo Ramos
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: *Khan Funds Management America, Inc., et al. v. Nations Technologies Inc. et al.*, No. 1:22-cv-05055-ER (S.D.N.Y.)

Dear Judge Ramos:

We were recently retained to represent Plaintiffs in the above-referenced matter. *See* Dkts. 23 & 24. I write to inform the Court that counsel for Plaintiffs and for Defendants have met and conferred and jointly and respectfully request that the Court enter the following schedule for Plaintiffs' filing of an Amended Complaint and the parties' briefing of motions to dismiss:

Plaintiffs file Amended Complaint: December 12, 2022

Defendants file Motion(s) to Dismiss the Amended Complaint: January 23, 2023

Plaintiffs file Opposition papers: March 6, 2023

Defendants file Reply papers: March 27, 2023

In addition, the parties jointly request that the Court permit Defendants Nations Technologies Inc. and Nations Technologies (USA) Inc. (collectively, "Nations") to file a memorandum of law in support of their motion to dismiss of up to 50 pages; that it permit Plaintiffs to file a brief in opposition to Nations' motion to dismiss of up to 50 pages; and that it permit Nations to file a reply brief of up to 20 pages. To the extent Defendants other than Nations separately move to dismiss the Amended Complaint, the parties propose that any supporting, opposition, and reply briefs comply with the standard page limits.

Respectfully,

/s/ Akiva Shapiro
Akiva Shapiro

cc: Counsel Of Record